

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1

**FOLLOW UP INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO THE UNITED STATES POSTAL SERVICE
REGARDING RESPONSES FROM USPS WITNESS BOZZO
(AAP/USPS -T15-1, AAP/USPS T15-8)**

Pursuant to Section 25 and 26 of the Commission's Rules of Practice and Procedure, the Association of American Publishers (AAP), hereby submits the following interrogatories and request for production of documents to the United States Postal Service. AAP incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed January 24, 2000). We are designating these interrogatories to the Postal Service at large, the Service can identify any witness with knowledge.

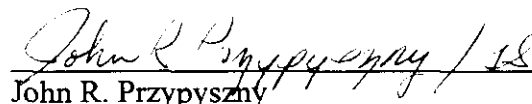
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document, by First-Class Mail, upon the participants in this proceeding


John R. Przypyszny

Date: April 3, 2000

**INTERROGATORIES OF
ASSOCIATION OF AMERICAN PUBLISHERS
TO THE UNITED STATES POSTAL SERVICE**

AAP/USPS - 1 – In AAP/USPS – T15-1 Response, Witness Bozzo states he has no knowledge whether any other Postal Service witness in this case has addressed the issue of cost minimization. Please confirm if any USPS witness in this case has analyzed or addressed whether the Postal Service’s actual plans and procedures are cost minimizing. Please provide the names of any witnesses who have addressed this issue. Additionally, please provide a cited passage in the testimony where this issue is addressed.

AAP/USPS - 2 – In AAP/USPS – T15-8 Response, Witness Bozzo states he is unaware of any cost studies that incorporate vehicle arrivals and departures as cost drivers. Please confirm if any USPS witness in this case has knowledge about the existence of any studies that incorporate this information. Please provide the name of the specific witness who has addressed this issue. Additionally, please provide a cited passage in the testimony where this issue is addressed or the location of the particular study.